Remarks

This Application has been carefully reviewed in light of the Office Action dated December 4, 2003. Applicants appreciate the Examiner's consideration of the Application. In order to advance prosecution of the present Application, Applicants have amended Claims 1-3, 5-7, 9-12, 14-15, and 17-18 to clarify various inventive aspects recited in the claims, and have canceled Claims 4, 8, and 16 without prejudice or disclaimer. Certain of these amendments have not narrowed the claims and are not made in relation to patentability. Additionally, Applicants have added new Claims 19-35. Applicants respectfully request reconsideration and allowance of all amended claims and consideration and allowance of all new claims.

Applicants Claims are Allowable over *Gross*

The Examiner rejects Claims 1-18 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,802,253 to Gross, et al. (*"Gross"*). Applicants respectfully disagree.

Gross discloses a rule-based system for handling incoming email messages. (Title; Abstract) According to the system disclosed in *Gross*, a plurality of rules are defined, each rule including an event indicia (when), a condition indicia (if), and an action indicia (then) (i.e. a when-if-then triplet). (*See* Column 2, Lines 44-49; Column 4, Lines 21-30; Claim 1) Events include receipt of a new message, the form of a received message, the reading of a message, the filing of a message, and other events. (*See* Column 4, Line 45 through Column 6, Line 13, describing the different types of events; Claim 5) An event generator detects the occurrence of events, such as the receipt of a new message. (*See* Claim 1; Column 4, Lines 33-44) An event manager includes one or more event queues and creates event records for the events to store in the event queue. (*See* Claim 1; Column 7, Lines 30-34) For received messages, the event manager determines whether an event occurred, and if an event occurred (e.g., the message is a newly received message), the event manager creates a new message event (which includes a pointer to the newly received message) and stores the new message event in the event queue for processing. (*See* Column 7, Lines 30-34) A rule processor determines which of the rules have an event (a when) corresponding to the detected event and invokes only those rules for which the event indicia (when) corresponds to the determined

event. (*See* Abstract; Column 2, Lines 49-55) The condition indicia (if) of each determined rule is then evaluated and if the condition is met, the action (then) identified in the rule is performed. (*See* Claim 1; Column 4, Lines 31-32; Column 8, Lines 16-21)

According to the system disclosed in *Gross*, a user can also define events and rules for handling the events. (*See, e.g.,* Figures 10A-10B) For example, a user can specify that upon the event of a new email message, if the message is from E.Flynn, then the message should be moved to the "Status Reports" folder. (*See* Figures 10A-10B) The focus of *Gross* is on the use of the when-if-then triplet, "which facilitates definition of events considered to be significant events upon which to trigger actions." (*See* Abstract; Column 2, Lines 44-55) This capability reduces processing associated with previous systems (i.e. those based on an if-then combination), which would require that all conditions be tested for an incoming messages, rather than only those within a relevant event. (*See* Column 2, Lines 22-30 and Lines 44-55)

In contrast, Applicants' Claim 1, as amended, recites:

A method for handling jobs within a computer system, comprising:

in response to a request for a job to be performed, generating a work item representing the job to be performed, *the work item comprising a category, a state, a change history, and a description of the job represented by the work item, the job comprising a customer-generated request*;

placing the work item into a particular queue in a plurality of queues based at least in part on the category of the work item, each queue in the plurality of queues being for storing work items representing jobs to be performed;

in turn, opening the work item in the particular queue in response to a request from a business process, and executing one or more tasks on the work item, *each task being for resolving at least a portion of the job represented by the work item by resolving at least a portion of the customer-generated request*; and

after executing the one or more tasks on the work item:

modifying the state of the work item in response to execution of the one or more tasks;

updating the change history of the work item in response to execution of the one or more tasks;

if the job represented by the work item is complete, archiving the work item; and

> *if the job represented by the work item is not yet complete,*
> *placing the work item into one of the plurality of queues based at least in*
> *part on one or more tasks to be executed on the work item.*

As the above discussion makes clear, *Gross* fails to disclose, teach, or suggest certain of the limitations recited in Claim 1, as amended.

For example, *Gross* fails to disclose, teach, or suggest *"the work item comprising a category, a state, a change history, and a description of the job represented by the work item, the job comprising a customer-generated request,"* as recited in Claim 1 as amended. *Gross* merely discloses a rule-based system for handling incoming email messages and does not even mention a job represented by a work item, let alone "the job comprising a customer-generated request," as recited in Claim 1 as amended.

As another example, *Gross* fails to disclose, teach, or suggest *"each task being for resolving at least a portion of the job represented by the work item by resolving at least a portion of the customer-generated request,"* as recited in Claim 1 as amended. At least because the rule-based email-handling system disclosed in *Gross* fails to disclose, teach, or suggest a "job represented by [a] work item, the job comprising a customer-generated request," *Gross* necessarily fails to disclose, teach, or suggest "each task being for resolving at least a portion of the job represented by the work item," particularly "by resolving at least a portion of the customer-generated request," as recited in Claim 1 as amended.

As another example, *Gross* fails to disclose, teach, or suggest, after executing the one or more tasks on the work item, *"modifying the state of the work item in response to execution of the one or more tasks," "updating the change history of the work item in response to execution of the one or more tasks," "if the job represented by the work item is complete, archiving the work item,"* and *"if the job represented by the work item is not yet complete, placing the work item into one of the plurality of queues based at least in part on at least one or more tasks executed on the work item,"* as recited in Claim 1 as amended. There simply is no disclosure in *Gross* that the events generated by the system disclosed in *Gross* in response to detecting that an event has occurred (a new message event indicating

that a new email message has been received and pointing to the email message), includes any "state," much less that the state is modified in response to execution of one or more tasks. Similarly, there simply is no disclosure in *Gross* of updating a change history of an event disclosed in *Gross* in response to execution of one or more tasks. Furthermore, while *Gross* discloses forwarding an email message to an appropriate folder as defined by a when-if-then rule, there is no disclosure in *Gross* that a determination is made regarding whether a job associated with a work item is completed. This is particularly true in light of the fact that *Gross* does not disclose, teach, or suggest a job represented by a work item, as discussed above. Thus, *Gross* does not even disclose, teach, or suggest taking any action based on whether the job represented by a work item is complete, let alone "if the job represented by the work item is complete, archiving the work item," and "if the job represented by the work item is not yet complete, placing the work item into one of the plurality of queues based at least in part on at least one or more tasks executed on the work item," as recited in Claim 1 as amended.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependent claims. For reasons similar to those discussed above with reference to independent Claim 1, Applicants respectfully request reconsideration and allowance of independent Claim 11 and its dependent claims.

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from *Gross*. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejection.

New Claims 19-35 are Allowable

In addition to being dependent on allowable independent claims, new Claims 19-25 (which depend from independent Claim 1) and new Claims 26-35 (which depend from independent Claim 11) recite further patentable distinctions over the prior art of record. To avoid burdening the record and in view of the clear allowability of independent Claims 1 and

11, Applicants do not specifically discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. For at least these reasons, Applicants respectfully request consideration and allowance of new Claims 19-35.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

A check in the amount of $216.00 is enclosed to cover the cost of twelve new claims total over twenty total. Although Applicants believe no other fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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